

EXHIBIT C

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December 24, 2024

VIA EMAIL

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Re: MDL 3084 – Plaintiffs’ Compliance with Pretrial Order No. 10

Counsel,

We write to discuss Plaintiffs’ obligations under Pretrial Order No. 10 (“PTO 10”). PTO 10 requires each Plaintiff who joined the MDL on or before March 26, 2024 to submit a complete PFS via MDL Centrality by no later than May 25, 2024—i.e., within 60 days after March 26, 2024. Dkt. No. 348 at 5. PTO 10 requires each Plaintiff who joins the MDL after March 26, 2024 to submit the complete PFS within 30 days of filing. *Id.* at 6. On November 8, 2024, the Court adopted the stipulation entered between Cutter and Uber, extending the PFS deadlines for certain Plaintiffs represented by Cutter. Pursuant to the parties’ stipulation and the Court’s Order, a “Plaintiff Fact Sheet for any Plaintiff represented by Cutter Law P.C. who joined the MDL by October 15, 2024” was due on December 20, 2024. Dkt. No. 1855 at 7.

The following Cutter Plaintiffs joined the MDL by October 15, 2024 but did not provide the required PFS by December 20, 2024:

1. Jane Roe CL 11, No. 3:24-cv-04672, MDLC ID 1773
2. Jane Roe CL 13, No. 3:24-cv-04677, MDLC ID 1775
3. Jane Roe CL 16, No. 3:24-cv-04837, MDLC ID 1778
4. Jane Roe CL 24, No. 3:24-cv-05536, MDLC ID 2082
5. Jane Roe CL 25, No. 3:24-cv-05541, MDLC ID 2084

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2

6. Jane Roe CL 30, No. 3:24-cv-05591, MDLC ID 2089
7. Jane Roe CL 33, No. 3:24-cv-05691, MDLC ID 2092
8. Jane Roe CL 34, No. 3:24-cv-05696, MDLC ID 2093
9. Jane Roe CL 35, No. 3:24-cv-05706, MDLC ID 2094
10. Jane Roe CL 41, No. 3:24-cv-05736, MDLC ID 2102
11. Jane Roe CL 44, No. 3:24-cv-05744, MDLC ID 2105
12. Jane Roe CL 46, No. 3:24-cv-05748, MDLC ID 2107
13. John Roe CL 5, No. 3:24-cv-05839, MDLC ID 2109
14. Jane Roe CL 48, No. 3:24-cv-05810, MDLC ID 2110
15. Jane Roe CL 49, No. 3:24-cv-05811, MDLC ID 2111
16. Jane Roe CL 50, No. 3:24-cv-05825, MDLC ID 2112
17. Jane Roe CL 54, No. 3:24-cv-05832, MDLC ID 2116
18. Jane Roe CL 55, No. 3:24-cv-05835, MDLC ID 2117
19. Jane Roe CL 56, No. 3:24-cv-05837, MDLC ID 2118
20. Jane Roe CL 57, No. 3:24-cv-05841, MDLC ID 2119
21. Jane Roe CL 58, No. 3:24-cv-05846, MDLC ID 2120
22. Jane Roe CL 59, No. 3:24-cv-05847, MDLC ID 2121
23. Jane Roe CL 65, No. 3:24-cv-06189, MDLC ID 2492
24. Jane Roe CL 68, No. 3:24-cv-06669, MDLC ID 2597
25. Jane Roe CL 69, No. 3:24-cv-06862, MDLC ID 2598
26. Jane Roe CL 72, No. 3:24-cv-06992, MDLC ID 2601
27. Jane Roe CL 74, No. 3:24-cv-07152, MDLC ID 2615
28. Jane Roe CL 75, No. 3:24-cv-07153, MDLC ID 2616
29. Jane Roe CL 17, No. 3:24-cv-04915, No MDLC ID¹
30. Jane Roe CL 21, No. 3:24-cv-05525, No MDLC ID*
31. Jane Roe CL 27, No. 3:24-cv-05583, No MDLC ID*
32. Jane Roe CL 28, No. 3:24-cv-05586, No MDLC ID*
33. Jane Roe CL 36, No. 3:24-cv-05720, No MDLC ID*
34. John Roe CL 4, No. 3:24-cv-05727, No MDLC ID*
35. Jane Roe CL 37, No. 3:24-cv-05728, No MDLC ID*
36. Jane Roe CL 38, No. 3:24-cv-05729, No MDLC ID*
37. Jane Roe CL 39, No. 3:24-cv-05732, No MDLC ID*
38. Jane Roe CL 40, No. 3:24-cv-05734, No MDLC ID*
39. Jane Roe CL 43, No. 3:24-cv-05741, No MDLC ID*
40. Jane Roe CL 45, No. 3:24-cv-05746, No MDLC ID*
41. Jane Roe CL 53, No. 3:24-cv-05831, No MDLC ID*
42. Jane Roe CL 60, No. 3:24-cv-05848, No MDLC ID*
43. Jane Roe CL 61, No. 3:24-cv-05850, No MDLC ID*
44. Jane Roe CL 64, No. 3:24-cv-06188, No MDLC ID*
45. Jane Roe CL 67, No. 3:24-cv-06191, No MDLC ID*

¹ The parties' stipulation also called for each "Plaintiff represented by Cutter Law P.C. who joined the MDL by October 15, 2024" to provide a "bona fide ride receipt or Pretrial Order No. [5] information sheet" by November 15, 2024. Dkt. No. 1855 at 7. The Plaintiffs in this list without MDLC IDs, including Jane Roe CL 17, No. 3:24-cv-04915, have not complied with this portion of the parties' agreement either. Other Plaintiffs who have not purported to submit a bona fide ride receipt or Pretrial Order No. 5 information sheet are designated by an "*".

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3

- 46. Jane Roe CL 70, No. 3:24-cv-06863, No MDLC ID*
- 47. Jane Roe CL 71, No. 3:24-cv-06864, No MDLC ID*
- 48. Jane Roe CL 73, No. 3:24-cv-07030, No MDLC ID*

In addition, the following Cutter Plaintiffs joined the MDL after October 15, 2024 but have not provided the required PFS within 30 days of filing their complaints:

- 1. Jane Roe CL 76, No. 3:24-cv-07569, No MDLC ID²
- 2. Jane Roe CL 77, No. 3:24-cv-07571, No MDLC ID³
- 3. Jane Roe CL 78, No. 3:24-cv-07584, MDLC ID 2682⁴
- 4. Jane Roe CL 79, No. 3:24-cv-07587, No MDLC ID⁵

Uber requests a meet and confer to discuss each of the cases above. We are generally available on Thursday, December 26 and Friday, December 27. If neither of those days work for you, please suggest alternative times and days when you are able to meet and confer during the week of December 30th. As a reminder, per Pretrial Order No. 8, unless “both parties otherwise agree, the meet and confer process shall begin within three business days of a party making a request for the meet and confer conference.” Dkt. No. 323 at 1.

Sincerely,

**PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**

By: /s/ Kyle Smith

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² Complaint filed on October 31, 2024. Plaintiff has also not submitted a bona fide ride receipt or Pretrial Order No. 5 information sheet within 14 days of joining the MDL as Pretrial Order No. 10 requires. Dkt. No. 348 at 3–4.

³ Complaint filed on October 31, 2024. Plaintiff has also not submitted a bona fide ride receipt or Pretrial Order No. 5 information sheet within 14 days of joining the MDL as Pretrial Order No. 10 requires. Dkt. No. 348 at 3–4.

⁴ Complaint filed on November 1, 2024.

⁵ Complaint filed on November 1, 2024. Plaintiff has also not submitted a bona fide ride receipt or Pretrial Order No. 5 information sheet within 14 days of joining the MDL Pretrial Order No. 10 requires. Dkt. No. 348 at 3–4.